

Message

From: BECKHAM, LISA [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=75A0012699094CF59508BB04E90B393C-LBECKHAM]
Sent: 11/13/2014 9:01:18 PM
To: Tennille B. Begay [tbbegay@navajo-nsn.gov]
Subject: RE: CAM Plan Examples

Hi Tennille- So sorry -- I was out on vacation.

Looking through the available information, I think this link is actually the most helpful:
<http://www.epa.gov/ttn/emc/cam/draftcamappb.pdf>.

This document provides summaries of performance indicators when using baghouse or ESPs.

This document will not cover the use of bag leak detection systems, which I think was mentioned during our last call. EPA has some older guidance, but the best resource may be to look at other EPA rules. We haven't put bag leak detection in any of the EGU rules yet (or at least I'm not finding it if we did), but here is a sample from another rule (40 CFR 60.5200):

(b) If a bag leak detection system is used, your monitoring plan must include a description of the following items:

(1) Installation of the bag leak detection system in accordance with paragraphs (b)(1)(i) and (ii) of this section.

(i) Install the bag leak detection sensor(s) in a position(s) that will be representative of the relative or absolute particulate matter loadings for each exhaust stack, roof vent, or compartment (e.g., for a positive pressure fabric filter) of the fabric filter.

(ii) Use a bag leak detection system certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.

(2) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established. Use a bag leak detection system equipped with a system that will sound an alarm when the system detects an increase in relative particulate matter emissions over a preset level. The alarm must be located where it is observed readily and any alert is detected and recognized easily by plant operating personnel.

(3) Evaluations of the performance of the bag leak detection system, performed in accordance with your monitoring plan and consistent with the guidance provided in Fabric Filter Bag Leak Detection Guidance, EPA-454/R-98-015, September 1997 (incorporated by reference, see §60.17).

(4) Operation of the bag leak detection system, including quality assurance procedures.

(5) Maintenance of the bag leak detection system, including a routine maintenance schedule and spare parts inventory list.

(6) Recordkeeping (including record retention) of the bag leak detection system data. Use a bag leak detection system equipped with a device to continuously record the output signal from the sensor. (c) You must conduct an initial performance evaluation of each continuous monitoring system and bag leak detection system, as applicable, in accordance with your monitoring plan and to §60.13(c). For the purpose of this subpart, the provisions of §60.13(c) also apply to the bag leak detection system. You must conduct the initial performance evaluation of each continuous monitoring system within 60 days of installation of the monitoring system

Lisa

From: Tennille B. Begay [mailto:tbbegay@navajo-nsn.gov]
Sent: Friday, November 07, 2014 10:57 AM
To: BECKHAM, LISA
Subject: CAM Plan Examples

Hi Liza,

On our call this past month, we discussed NGS And FCPP's need for revising their CAM plan. You said that you might have some examples that might be helpful, I was wondering if you could send the examples over?

Thanks,

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